HOLOPHANE
LEADER IN LIGHTING SOLUTIONS
An AcuityBrands Company

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March 28, 2003

Mr. William G. Pennington
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: 2005 Energy Efficiency Standards – Outdoor Lighting – Signs – Draft #3

Dear Mr. Pennington:

I am writing you on behalf of the Holophane Corporation, an AcuityBrands Company, regarding the LPD values in Draft #3, Table 147-B, Page 129.

We note that the previous LPD values have been raised to 11 for LZ's 2, 3, and 4. Noting Chart #2 (see below) included in our previous comments of December 19, 2002, please see that the size of this evaluation was based only on the 10' H x 20' W Internally Illuminated Sign Cabinet as per J. Benya's model, and was calculated considering the cabinet at 18" deep as shown. The only lamp/luminaire configuration capable of providing 11 LPD was the 350W PS MH perimeter luminaire lighting system. This system, as shown, provides excellent energy saving capabilities, while using a magnetic ballast, designed to start at –40 Deg. F. and driving the lamp at full rated wattage output.

While there are reliable electronic ballasts currently available for T-8 and T-12 fluorescent lamps, which have a minimum starting temperature of only 0 Deg F., there are no such reliable electronic ballasts for HID lamps yet available for Type II outdoor use.

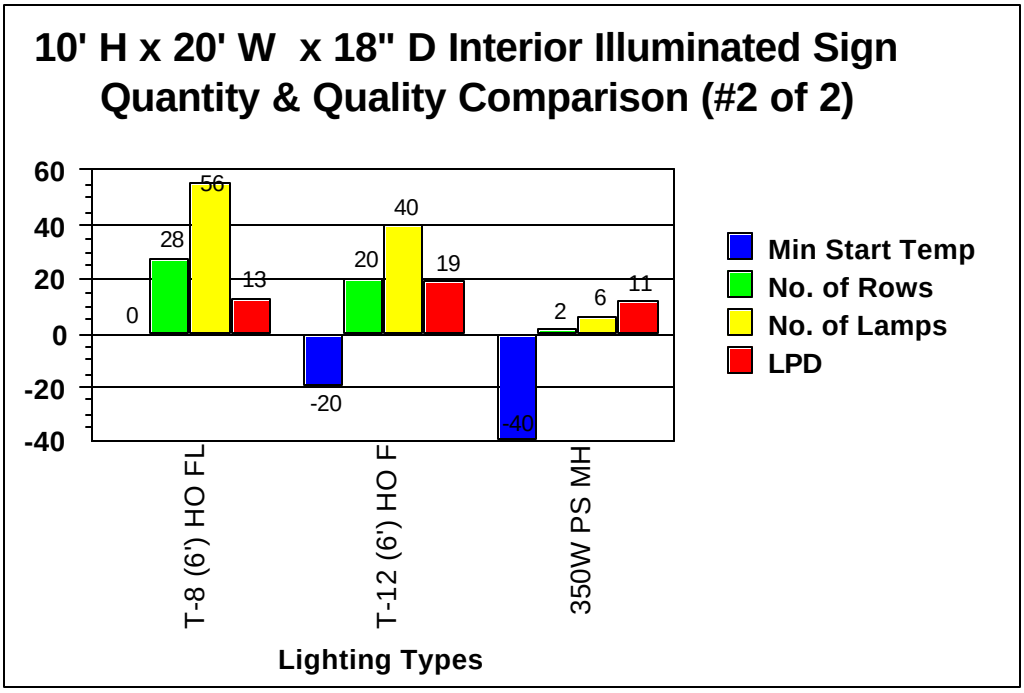
SIGN CABINETS OF GREATER DEPTH:

May require different types of lamps, (i.e. Pulse start Metal Halide, Standard Metal Halide, T-8 or T-12 Fluorescents) depending on size, shape, aspect ratio, and possible irregular shaped perimeters.

May require greater quantities of lamps to provide necessary illumination and uniformity when viewing the outside of the graphic.

SIGN CABINETS OF MORE SHALLOW DEPTH:

May also require different types of lamps, (i.e. T-8 or T-12 Fluorescents) depending on size, shape, aspect ratio, and possible irregular shaped perimeters, very possibly necessitating the need for lamp centers that are spaced closer together.



(Chart #2 of 2)

In summary, the LPD's that are currently recommended under Draft #3 remain beyond the capabilities of current and projected 2005 lamp and luminaire technology to achieve with all sizes of Interior Illuminated Signage. We strongly urge the Commission to carefully consider present state of the art in the lighting of signs ($11w/ft^2$ – $25w/ft^2$) and the available lighting technology to provide a workable solution to more efficiently utilize energy resources. We believe this can only be accomplished through the utilization of solid technical criteria approved by and coordinated with carefully chosen representatives of the Sign lighting industry, which doesn't seem to have been included in the EES Standards thus far. In addition, as the sign lighting portion of the total lighting market in California has been estimated at a good deal less than 1 percent of the overall energy requirement for lighting, we are therefore suggesting that all sign lighting be exempted from the EES.

Thank you for your careful consideration of these comments.

Sincerely,

Richard A. Bagni, MIESNA, LC
Director, Media Group West